



ORDER

September 25, 2020

Via ECF:

Hon. Edward S. Kiel, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: *Smith, et al., v. Pro Custom Solar, LLC* – Case No. 2:19-cv-20673-KM-ESK
Plaintiffs’ Opposition to Letter-Motion to Bifurcate Discovery**

Dear Judge Kiel:

Plaintiffs and Defendant have met-and-conferred regarding a proposed discovery schedule, as Ordered by Your Honor on September 15, 2020 (Dkt. 33). Defendant agrees with the proposed discovery schedule set forth in Plaintiffs’ opposition to Defendant’s motion to bifurcate discovery (Dkt. 31.) That proposed schedule is provided below:

<u>Deadline</u>	<u>Plaintiffs’ Proposal</u>
Deadline to Amend Pleadings and/or Add Parties	November 12, 2020
Deadline to File Proposed Stipulated Protective Order	October 2, 2020
Deadline to Complete Fact Discovery	April 16, 2021
Plaintiffs’ Expert Disclosures Due	April 23, 2021
Defendants’ Expert Disclosures Due	May 7, 2021
Rebuttal Expert Disclosures Due	May 21, 2021
Deadline to Complete Expert Discovery	June 18, 2021
Deadline to Engage in Good Faith Settlement Discussions	June 18, 2021

Deadline for Plaintiffs to File Motion for Class Certification	June 25, 2021
Deadline for Defendants to File Opposition to Class Certification	July 23, 2021
Deadline for Plaintiffs to File Reply ISO Motion for Class Certification	August 6, 2021
Subsequent Case Management Conference	TBD: to be set after a ruling on class certification

Respectfully submitted,

Dated: September 25, 2020

By: /s/ Patrick H. Peluso

One of Plaintiffs' Attorneys

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**Admitted Pro Hac Vice*

The Joint Discovery Plan provided by the parties is adopted by the Court and SO ORDERED.



Edward S. Kiel, USMJ

Date: September 28, 2020